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24 **UNITED STATES DISTRICT COURT**
25 **DISTRICT OF NEVADA**

26 SONORO INVEST S.A., a Panamanian
27 corporation,

Case No. : 2:15-cv-02286-JAD-CWH

28 Plaintiff,

vs.

29 ROBERT MILLER, an individual; ANDREW
30 SHERMAN, an individual; COSTAS
31 TAKKAS, an individual; and STEPHEN
32 GOSS, an individual,

**DECLARATION OF CHRISTINA C.
TIZZANO IN SUPPORT OF JOINT
EMERGENCY MOTION FOR
CLARIFICATION OF ORDER
GRANTING STAY OF DISCOVERY
(ECF NO. 94)**

33 Defendants

34 and

35 ABAKAN, INC., a Nevada corporation,

36 Nominal Defendant.

37 I, Christina C. Tizzano, hereby declare under penalty of perjury as follows:

38 1. I am an attorney of Chilcote Law Firm LLP and counsel of record for defendant

1 Andrew Sherman ("Mr. Sherman) in the above-entitled action. I have personal knowledge
2 regarding the information contained herein.

3 2. I submit this Declaration pursuant to L.R. 7-4 and in support of Mr. Sherman and
4 Plaintiff Sonoro Invest S.A.'s Joint Emergency Motion for Clarification of Order Granting Stay
5 of Discovery.

6 3. Mr. Sherman and Plaintiff Sonoro Invest S.A. make the instant motion on an
7 emergency basis because certain of Mr. Sherman's responses to Plaintiff's First Request for
8 Production of Documents are due to be produced on May 31, 2016.

9 4. I hereby certify that Mr. Sherman and Plaintiff Sonoro Invest S.A.'s Joint
10 Emergency Motion for Clarification of Order Granting Stay of Discovery is made in compliance
11 with L.R. 7-4.

12 I declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the foregoing is true
13 and correct.

14 Executed this 27th day of May, 2016.

15 By: /s/Christina C. Tizzano
16 CHRISTINA C. TIZZANO

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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of May, 2016, a true and correct copy of the foregoing **DECLARATION OF CHRISTINA C. TIZZANO IN SUPPORT OF JOINT EMERGENCY MOTION FOR CLARIFICATION OF ORDER GRANTING STAY OF DISCOVERY (ECF NO. 94)** was served on counsel through the Court's electronic service system as follows:

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